FACT SHEET

as required by LAC 33:IX.3111, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0058882** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

I. **THE APPLICANT IS:** CECOS International, Inc.
Calcasieu Facility
P. O. Box 1849
Sulphur, LA 70664

II. **PREPARED BY:** Paula M. Roberts
DATE PREPARED: July 10, 2006

III. **PERMIT ACTION:** renewal of LPDES permit LA0058882/AI 276
LPDES application received: June 30, 2004

IV. **FACILITY INFORMATION:**

A. The application is for the intermittent discharge of stormwater runoff from the inactive closed and capped landfill cells and undeveloped areas from an existing industrial waste disposal facility.

B. The facility is located at 918 Willow Springs Road, four miles east of LA Hwy. 27 and five miles north of Westlake; Calcasieu Parish, Louisiana.

C. This facility is an aqueous industrial waste disposal facility that utilizes deep well injection to dispose of aqueous industrial wastes received from off-site and aqueous waste generated on-site.

The stormwater runoff can be classified into three groups: 1) runoff from areas associated with the active on-site disposal well; 2) runoff from the closed and capped landfill cells; and 3) runoff from undeveloped areas. All runoff associated with the disposal well is contained and injected into the on-site disposal well.

There is secondary containment around the scales, and the Tank area that includes tank – T-1 through T-9, and TT-1, and TT-2, as well as the chemicals and materials contained on site. Any runoff from these areas are sent to the injection well. About 2000 gallons of leachate are accepted each month.

Definition: Aqueous - something made up of water; relating to, like, containing, or dissolved in water: watery.

D. The LAC references are the legal references while the 40 CFR references are presented for information purposes only. In most cases, LAC language is based on and is identical to the 40 CFR language. 40 CFR Parts 401-402, and 405-471 have been adopted by reference at LAC 33;IX.4903 and will not have dual references. In addition, state standards LAC 33.IX.Chapter 11) will not have dual references.

LAC 33:IX.Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.4901, 4903, 2301.F.

Technology Based Effluent Limitations and Conditions: Regulations promulgated at LAC 33:IX.2707.A/40 CFR Part 122.44 (a) require technology-based effluent limitations to be placed in LPDES permits based on effluent limitations guidelines where applicable, on BPJ(best professional judgment) in the absence of guidelines, or on a combination of the two.

Guideline	Reference
None	None

Other Sources of technology based limits:
LDEQ Stormwater Guidance, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)
Best Professional Judgment

E. Outfall 001

Discharge Location:	Latitude 30° 19 ′ 18″ North Longitude 93° 18′ 02″ West
Description:	stormwater runoff from inactive (closed and capped cells) (intermittent)
Design Flow:	variable

Outfall 002

Discharge Location:	Latitude 30° 19 ′ 20″ North Longitude 93° 18′ 27″ West
Description:	stormwater runoff from inactive (closed and capped cells) (intermittent)
Design Flow:	variable

Outfall 003

Discharge Location:	Latitude 30° 19 ′ 05″ North Longitude 93° 18′ 01″ West
Description:	stormwater runoff from inactive (closed and capped cells) (intermittent)
Design Flow:	variable

V. RECEIVING WATERS:

The discharge from Outfall(s) 001 and 002 is from an effluent pipe into an unnamed drainage ditch, thence into Little River in segment 030804 of the Calcasieu River Basin. The discharge from Outfall 003 flows from an effluent pipe into an unnamed ditch, thence into West Fork Calcasieu River in segment 030801 of the Calcasieu River Basin. These two segments are both listed on the 303(d) list of impaired waterbodies.

This facility only discharges non-contact stormwater runoff, Water Quality Based Effluent Limitations will not be calculated for this facility, therefore, values for the **critical low flow** (7Q10), **harmonic mean flow, hardness** ($CaCO_3$), and the **fifteenth percentile** were not requested.

The designated uses and degree of support for Segment 030804 of the Calcasieu River Basin are as indicated in the table below[1/]:

Overall Degree of Support for Segment 030804	Degree of Support of Each Use						
Partial	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Full	Full	Not	N/A	N/A	N/A	N/A

[1/]The designated uses and degree of support for Segment 030804 of the Calcasieu River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2002 Water Quality Management Plan, Volume 5, Part B, Water Quality Inventory respectively.

The designated uses and degree of support for Segment 030801 of the Calcasieu River Basin are as indicated in the table below[1/]:

Overall Degree of Support for Segment 030801	Degree of Support of Each Use						
Full	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Full	Full	Not	N/A	N/A	N/A	Full

[1/]The designated uses and degree of support for Segment 030801 of the Calcasieu River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2002 Water Quality Management Plan, Volume 5, Part B, Water Quality Inventory respectively.

Subsegment 030804, Little River-Headwaters to West Fork Calcasieu River, is listed on LDEQs Final 2004 305(b)/303(d) Integrated Report as impaired for Mercury and was once listed as impaired for Dissolved Oxygen. The **Little River Watershed TMDL for Oxygen-Demanding Substances including a Watershed Nonpoint Source Load Allocation (Subsegment 030804)** was finalized on March 15, 2002. To date no TMDLs have been established for this waterbody to address Mercury. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL.

According to the **Little River Watershed TMDL for Oxygen-Demanding Substances,** subsegment 030804 was void of any known oxygen-demanding point source discharges. The Cecos facility was acknowledged and documented but not included in the model.

Subsegment 030801, West Fork Calcasieu River-From confluence of Beckwith Creek and Hickory Branch to Calcasieu River, is listed on LDEQs Final 2004 305(b)/303(d) Integrated Report as impaired for Mercury and was once listed as impaired for Dissolved Oxygen. The **TMDL for Dissolved Oxygen for the Calcasieu Estuary (Subsegments 030305, 030801, 030901, and 031001** was finalized on July 1, 2002. To date no TMDLs have been established for this waterbody to address Mercury. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL.

According to the **TMDL for Dissolved Oxygen for the Calcasieu Estuary,** under summer critical conditions, the D.O. criteria for all subsegments were attained through reductions in nonpoint source loadings, except Bayou D'Inde. Under winter conditions, the DO criteria in Contraband Bayou and West Fork/Houston River were attainable through reductions in nonpoint source loadings.

The effluent data for Mercury submitted with the application, reported there was no excursion above the required minimum quantification level (MQL).

This facility discharges only stormwater runoff from three outfalls during rainfall events, it is unlikely, that this discharge will contribute to the Mercury impairment or contribute to the dissolved oxygen conditions in the receiving stream, therefore, there are no reductions or additional limitations imposed in this permit for these parameters. However, monitoring for Mercury is included in this permit as a part of the previous permit limitations.

VI. ENDANGERED SPECIES:

The receiving waterbody(ies), Subsegment(s) 030801and 030804 of the Calcasieu River Basin are not listed in Section II.2 of the Implementation Strategy as not requiring consultation with the U. S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 21, 2005 from Watson (FWS) to Gautreaux (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, further informal (Section 7, Endangered Species Act) consultation is not required. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

VIII. PUBLIC NOTICE:

The public notice is published in the local newspaper of general circulation and the Office of Environmental Services Public Notice Mailing List. Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit to the LDEQ contact person, listed below, and may request a public hearing to clarify issues involved in the permit decision. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation
Department of Environmental Quality Public Notice Mailing List

For additional information, contact:

Ms. Paula M. Roberts
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

The effluent limitations for the priority pollutants listed in the previous permit were based upon empirical data developed in the early 1980's for the regulation of toxic pollutants to hazardous waste facilities and sites with low potential stormwater.

The previous permit limits were also based upon technology-based effluent limitations, and according to the regulations promulgated at LAC 33:IX.2707.A/40 CFR Part 122.44(a) requires technology-based effluent limitations to be placed in LPDES permits based on effluent limitations guidelines where applicable, on BPJ (best professional judgment) in the absence of guidelines, or on a combination of the two.

OUTFALL(s) 001, 002, and 003

Final effluent limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Final Effluent Limits:

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Daily Max	Basis
TOC		---	50 mg/l	Multisector General Permit –Sector K.Table K-1 and previous permit limit
Oil & Grease		---	15 mg/l	Multisector General Permit-Sector K., Table K-1
Ammonia (NH_3-N)		---	19 mg/l	Multisector General Permit- Sector K., Table K-1
Total Phenols (4AAP)		---	500 ug/l	Previous permit limitation and BPJ
Metals & Cyanide				The following parameters are based upon the previous permit limitations and Best Professional Judgment
Total Antimony		---	600 ug/l	
Total Arsenic		---	100 ug/l	
Total Beryllium		---	100 ug/l	
Total Cadmium		---	100 ug/l	
Total Chromium		---	200 ug/l	
Total Copper		---	500 ug/l	
Total Lead		---	150 ug/l	
Total Mercury		---	10 ug/l	
Total Nickel		---	500 ug/l	
Total Selenium		---	100 ug/l	
Total Silver		---	100 ug/l	
Total Thallium		---	100 ug/l	
Total Zinc		---	1000 ug/l	
Total Cyanide		---	100 ug/l	

Volatile Compounds				The following parameters are based upon the previous permit limitations and Best Professional Judgment
Acrolein		---	100 ug/l	
Acrylonitrile		---	100 ug/l	
Benzene		---	100 ug/l	
Bromoform		---	100 ug/l	
Carbon Tetrachloride		---	100 ug/l	
Chlorobenzene		---	100 ug/l	
Chlorodibromomethane		---	100 ug/l	
Chloroethane		---	100 ug/l	
2-Chloroethly Vinyl Ether		---	100 ug/l	
Chloroform		---	100 ug/l	
Dichlorobromomethane		---	100 ug/l	
1,1-Dichloroethane		---	100 ug/l	
1,2- Dichloroethane		---	100 ug/l	
1,1-Dichlorethylene		---	100 ug/l	
1,2-trans-Dichlorethylene		---	100 ug/l	
1,2-Dichlorpropane		---	100 ug/l	
1,3-Dichloroporpylene		---	100 ug/l	
Ethylbenzene		---	100 ug/l	
Methyl Bromide		---	100 ug/l	
Methyl Chloride		---	100 ug/l	
Methylene Chloride		---	100 ug/l	
1,1,2,2-Tetrachloroethane		---	100 ug/l	
Tetrachloroethylene		---	100 ug/l	
Toluene		---	100 ug/l	
1,1,1-Trichloroethane		---	100 ug/l	
1,1,2-Trichloroethane		---	100 ug/l	
Trichloroethylene		---	100 ug/l	
Vinyl Chloride		---	100 ug/l	
Acid Compounds				The following parameters are based upon the previous permit limitations and Best Professional Judgment
2-Chlorphenol		---	100 ug/l	
2,4-Dichlorophenol		---	100 ug/l	
2,4-Dimethylphenol		---	100 ug/l	
4,6-Dinitro-o-Cresol		---	100 ug/l	
2,4-Dinitrophenol		---	100 ug/l	
2-Nitrophenol		---	100 ug/l	
4-Nitrophenol		---	100 ug/l	
Parachlormetacresol		---	100 ug/l	
Pentachlorphenol		---	100 ug/l	
Phenol		---	100 ug/l	
2,4,6-Trichlorophenol		---	100 ug/l	

Base Neutral Compounds				The following parameters are based upon the previous permit limitations and Best Professional Judgment
Acenaphthene		---	100 ug/l	
Acenaphthylene		---	100 ug/l	
Anthracene		---	100 ug/l	
Benzidine		---	100 ug/l	
Benzo(a)anthracene		---	100 ug/l	
Benzo(a)pyrene		---	100 ug/l	
Benzo(b)fluoranthene		---	100 ug/l	
Benzo(g,h,i)perylene		---	100 ug/l	
Benzo(k)fluoranthene		---	100 ug/l	
Bis(2-chlorethyl)ether		---	100 ug/l	
Bis(2-chlorethoxy)methane		---	100 ug/l	
Bis(2-chloroisopropyl)ether		---	100 ug/l	
Bis(2-ethylhexyl)phthalate		---	100 ug/l	
4-Bromophenyl Phenyl Ether		---	100 ug/l	
Butyl Benzyl Phthalate		---	100 ug/l	
4-Chlorophenyl Phenyl Ether		---	100 ug/l	
Chrysene		---	100 ug/l	
Dibenzo(a,h)anthracene		---	100 ug/l	
1,2-Dichlorobenzene		---	100 ug/l	
1,3-Dichlorobenzene		---	100 ug/l	
1,4-Dichlorobenzene		---	100 ug/l	
3,3-Dichlorobenzidine		---	100 ug/l	
Diethyl Phthalate		---	100 ug/l	
Dimethyl Phthalate		---	100 ug/l	
Di-n-butyl Phthalate		---	100 ug/l	
2,4-Dinitrotoluene		---	100 ug/l	
2,6-Dinitrotoluene		---	100 ug/l	
Di-n-octyl Phthalate		---	100 ug/l	
1,2-Diphenylhydrazine		---	100 ug/l	
Fluoranthene		---	100 ug/l	
Fluorene		---	100 ug/l	
Hexachlorobenzene		---	100 ug/l	
Hexachlorobutadiene		---	100 ug/l	
Hexachlorocyclopentadiene		---	100 ug/l	
Hexachloroethane		---	100 ug/l	
Ideno(1,2,3-cd) Pyrene		---	100 ug/l	
Isophorone		---	100 ug/l	
Naphthalene		---	100 ug/l	
Nitrobenzene		---	100 ug/l	
N-Nitrosodimethylamine		---	100 ug/l	
N-Nitododi-n-propylamine		---	100 ug/l	

N-Nitrosodiphenylamine		---	100 ug/l	
Phenanthrene		---	100 ug/l	
Pyrene		---	100 ug/l	
1,2,4-Trichlorobenzene		---	100 ug/l	
Pesticides, and PCB's		---		The following parameters are based upon the previous permit limitations and Best Professional Judgment
Aldrin		---	10 ug/l	
Alpha-BHC		---	10 ug/l	
Beta-BHC		---	10 ug/l	
Delta-BHC		---	10 ug/l	
Gamma BHC (Lindane)		---	10 ug/l	
Chlordane		---	10 ug/l	
4,4-DDT		---	10 ug/l	
4,4-DDE		---	10 ug/l	
4,4-DDD		---	10 ug/l	
Dieldrin		---	10 ug/l	
Alpha-Endosulfan		---	10 ug/l	
Beta-Endosulfan		---	10 ug/l	
Endosulfan sulfate		---	10 ug/l	
Endrin		---	5 ug/l	
Endrin Aldehyde		---	10 ug/l	
Heptachlor		---	10 ug/l	
Heptachlor Epoxide		---	10 ug/l	
PCB's(Total)		---	*	
PCB-1016		---	*	
PCB-1221		---	*	
PCB-1232		---	*	
PCB-1242		---	*	
PCB-1248		---	*	
PCB-1254		---	*	
PCB-1260		---	*	
Toxaphene		---	10 ug/l	

*** There shall be no discharge of polychlorinated biphenyls (PCB's). The minimum quantification level for PCB's is 1.0 ug/l. If any individual analytical test result for PCB's is less than the minimum quantification level, then a value of zero (0) shall be used for the Discharge Monitoring Report (DMR) calculations and reporting requirements.**

Other Effluent Limitations for Outfall 001

1) **pH**

In a report dated January 22, 1996, the permittee demonstrated that natural conditions of the soil proved to be highly acidic causing excursions in the 6-9 pH range. The previous permit contained a pH of not less than 5.5 standard units nor greater than 9.0 standard units. Therefore, through BPJ, the pH range has been retained from the previous permit.

2) **Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

LPDES Permit No. LA0058882: Issued: September 28, 1999
Effective: October 1, 1999
Expired: September 30, 2004

During the effective date of the permit and lasting through the expiration date of the permit.

Outfall 001, the intermittent discharge of inactive and undeveloped area stormwater from the northeastern portion of the site (estimated flow 0.12 MGD)
Outfall 002, the intermittent discharge of inactive and undeveloped area stormwater from the northeastern portion of the site (estimated flow 0.18 MGD)
Outfall 003, the intermittent discharge of inactive and undeveloped area stormwater from the northeastern portion of the site (estimated flow 0.014 MGD)

Effluent Characteristic	Discharge Limitations			Monitoring Requirements	
	lbs./day	other units (ug/l, unless stated)			
	Monthly Avg.	Monthly Avg.	Daily Max	Measurement Frequency	Sample Type
Flow	---	Report	Report	1/ month	Estimate
TOC	---	---	50 mg/l	1/month	Grab
Ammonia (NH_3-N)	---	---	19 mg/l	1/month	Grab
Oil & Grease	---	---	15 mg/l	1/month	Grab
Total Phenol (4AAP)	---	---	500	1/month	Grab
pH	---	5.5 (min)	6-9 (max)	1/day	Grab
Metals and Cyanide					
Total Antimony	---	---	600	1/month	Grab
Total Arsenic	---	---	100	1/month	Grab
Total Beryllium	---	---	100	1/month	Grab
Total Cadmium	---	---	100	1/month	Grab
Total Chromium	---	---	200	1/month	Grab
Total Copper	---	---	500	1/month	Grab
Total Lead	---	---	150	1/month	Grab
Total Mercury	---	---	10	1/month	Grab
Total Nickel	---	---	500	1/month	Grab
Total Selenium	---	---	100	1/month	Grab
Total Silver	---	---	100	1/month	Grab
Total Thallium	---	---	100	1/month	Grab
Total Zinc	---	---	1000	1/month	Grab
Total Cyanide	---	---	100	1/month	Grab
Volatile Compounds					
Acrolein	---	---	100	1/year	Grab
Acrylonitrile	---	---	100	1/year	Grab
Benzene	---	---	100	1/year	Grab
Bromoform	---	---	100	1/year	Grab
Carbon Tetrachloride	---	---	100	1/year	Grab
Chlorobenzene	---	---	100	1/year	Grab

Effluent Characteristic	Discharge Limitations			Monitoring Requirements	
	lbs./day	other units (ug/l, unless stated)			
	Monthly Avg.	Monthly Avg.	Daily Max	Measurement Frequency	Sample Type
Chlorodibromomethane	---	---	100	1/year	Grab
Chloroethane	---	---	100	1/year	Grab
2-Chlorethyl Vinyl Ether	---	---	100	1/year	Grab
Chloroform	---	---	100	1/year	Grab
Dichlorobromethane	---	---	100	1/year	Grab
1,1-Dichloroethane	---	---	100	1/year	Grab
1,2-Dichloroethane	---	---	100	1/year	Grab
1,1-Dichloroethylene	---	---	100	1/year	Grab
1,2-trans-Dichloroethylene	---	---	100	1/year	Grab
1,2-Dichloropropane	---	---	100	1/year	Grab
1,3-Dichloropropylene	---	---	100	1/year	Grab
Ethylbenzene	---	---	100	1/year	Grab
Methyl Bromide	---	---	100	1/year	Grab
Methyl Chloride	---	---	100	1/year	Grab
Methylene Chloride	---	---	100	1/year	Grab
1,1,2,2-Tetrachloroethane	---	---	100	1/year	Grab
Tetrachlorethylene	---	---	100	1/year	Grab
Vinyl Chloride	---	---	100	1/year	Grab
Dichlorobromethane	---	---	100	1/year	Grab
1,1-Dichloroethane	---	---	100	1/year	Grab
1,2-Dichloroethane	---	---	100	1/year	Grab
1,1-Dichloroethylene	---	---	100	1/year	Grab
Acid Compounds					
2-Chlorophenol	---	---	100	1/year	Grab
2,4-Dichlorophenol	---	---	100	1/year	Grab
2,4-Dimethyl phenol	---	---	100	1/year	Grab
4,6-Dinitro-o-Cresol	---	---	100	1/year	Grab
2,4-Dinitrophenol	---	---	100	1/year	Grab
2-Nitrophenol	---	---	100	1/year	Grab
4-Nitrophenol	---	---	100	1/year	Grab
Parachlorometacresol	---	---	100	1/year	Grab
Pentachlorophenol	---	---	100	1/year	Grab
Phenol	---	---	100	1/year	Grab
2,4,6-Trichlorophenol	---	---	100	1/year	Grab
Base Neutral Compounds					
Acenaphthene	---	---	100	1/year	Grab
Acenaphthylene	---	---	100	1/year	Grab
Anthracene	---	---	100	1/year	Grab
Benzidine	---	---	100	1/year	Grab
Benzo(a)anthracene	---	---	100	1/year	Grab
Benzo(a)pyrene	---	---	100	1/year	Grab
Benzo(a)fluoranthene	---	---	100	1/year	Grab
Benzo(g,h,i)perylene	---	---	100	1/year	Grab
Bis(2-chloroethyl) ether	---	---	100	1/year	Grab
Bis(2-chlorethoxy)methane	---	---	100	1/year	Grab
Bis(2-chloroisoprpoyl)ether	---	---	100	1/year	Grab
Bis(2-chloroethyl) ether	---	---	100	1/year	Grab
4-Bromophenyl Phenyl Ether	---	---	100	1/year	Grab

Effluent Characteristic	Discharge Limitations			Monitoring Requirements	
	lbs./day	other units (ug/l, unless stated)			
	Monthly Avg.	Monthly Avg.	Daily Max	Measurement Frequency	Sample Type
Chrysene	---	---	100	1/year	Grab
Dibenzo(a,h) anthracene	---	---	100	1/year	Grab
1,2-Dichlorobenzene	---	---	100	1/year	Grab
1,3-Dichlorobenzene	---	---	100	1/year	Grab
1,4-Dichlorobenzene	---	---	100	1/year	Grab
3,3-Dichlorobenzene	---	---	100	1/year	Grab
Diethyl Phthalate	---	---	100	1/year	Grab
Dimethyl Phthalate	---	---	100	1/year	Grab
Di-n-butyl phthalate	---	---	100	1/year	Grab
2,4-Dinitrotoluene	---	---	100	1/year	Grab
2,6-Dinitrotoluene	---	---	100	1/year	Grab
Di-n-octyl Phthalate	---	---	100	1/year	Grab
1,2-Diphenylhydrazine	---	---	100	1/year	Grab
Fluoranthene	---	---	100	1/year	Grab
Fluorene	---	---	100	1/year	Grab
Hexachlorobenzene	---	---	100	1/year	Grab
Hexachlorobutadiene	---	---	100	1/year	Grab
Hexachlorocyclopentadiene	---	---	100	1/year	Grab
Hexachlorethane	---	---	100	1/year	Grab
Ideno (1,2,3-cd)Pyrene	---	---	100	1/year	Grab
Isophorone	---	---	100	1/year	Grab
Naphthalene	---	---	100	1/year	Grab
Nitrobenzene	---	---	100	1/year	Grab
N-Nitrosodimethylamine	---	---	100	1/year	Grab
N-Nitrosodi-n-propylamine	---	---	100	1/year	Grab
N-Nitrosodi-n-propylamine	---	---	100	1/year	Grab
Phenanthrene	---	---	100	1/year	Grab
Pyrene	---	---	100	1/year	Grab
1,2,4-Trichlorobenzene	---	---	100	1/year	Grab
Pesticides and PCB's					
Aldrin	---	---	10	1/year	Grab
Alpha-BHC	---	---	10	1/year	Grab
Beta-BHC	---	---	10	1/year	Grab
Delta-BHC	---	---	10	1/year	Grab
Gamma-BHC (Lindane)	---	---	10	1/year	Grab
Chlordane	---	---	10	1/year	Grab
4,4-DDT	---	---	10	1/year	Grab
4,4-DDE	---	---	10	1/year	Grab
4,4-DDD	---	---	10	1/year	Grab
Dieldrin	---	---	10	1/year	Grab
Alpha-Endosulfan	---	---	10	1/year	Grab
Beta-Endosulfan	---	---	10	1/year	Grab
Endosulfan Sulfate	---	---	10	1/year	Grab
Endrin	---	---	5	1/year	Grab
Endrin Aldehyde	---	---	10	1/year	Grab
Heptachlor	---	---	10	1/year	Grab
Heptachlor Epoxide	---	---	10	1/year	Grab
PCB's (Total)	---	---	*	1/year	Grab
PCB-1016	---	---	*	1/year	Grab

Effluent Characteristic	Discharge Limitations			Monitoring Requirements	
	lbs./day	other units (ug/l, unless stated)			
	Monthly Avg.	Monthly Avg.	Daily Max	Measurement Frequency	Sample Type
PCB-1221	---	---	*	1/year	Grab
PCB-1232	---	---	*	1/year	Grab
PCB-1242	---	---	*	1/year	Grab
PCB-1248	---	---	*	1/year	Grab
PCB-1254	---	---	*	1/year	Grab
PCB-1260	---	---	*	1/year	Grab
Toxaphene	---	---	10	1/year	Grab

* This permit contained language prohibiting the discharge of PCB's.

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of EDMS indicates the following inspections were performed during the period beginning **November 2002** and ending **November 2004** for this facility.

Date – May 20, 2004
Inspector(s) – Greg Fruge, LDEQ/Southwest Regional Office
Findings and/or Violations:

A compliance evaluation inspection was done on this date and the following items were noted:

1. The facility personnel were calculating an average for pH and reporting it as a minimum and maximum on the discharge monitoring reports.
2. The pH was being analyzed more frequently than required by the permit, but some of those results were not being reported on the discharge monitoring reports.
3. The DMRs and lab reports for the period of April 2003 to April 2004 were reviewed. Gulf Coast Analytical conducts lab analysis for the facility.
4. A physical inspection did not reveal any apparent problems.

B) Compliance and/or Administrative Orders

A review of EDMS and TEMPO revealed the following enforcement actions(active) administered against this facility from the period beginning November 2002 through March 2005:

LDEQ Issuance:
Docket # - WE-L-04-0206
Issued – March 18, 2004
The letter informed the facility that on or about April 16, 2003 an inspection was conducted to determine compliance with the Louisiana Environmental Quality Act and supporting regulations. The inspection report, noting areas of concern was forwarded to the Enforcement Division. The letter informed the permittee that immediate steps needed to be taken to ensure compliance with all environmental regulations at their facility.

EPA Issuance: None

C) DMR Review

A review of the discharge monitoring reports for the period beginning **November 2002** through **November 2004** has revealed no permit violations.

XII. ADDITIONAL INFORMATION:

This facility has been downgraded from a major facility to a minor facility due to the nature of the discharge being strictly stormwater runoff from a capped landfill.

Biomonitoring was previously deleted as a parameter due to the fact that the discharge consists of only stormwater. Mass limits are not applied due to the intermittent nature of the discharge.

The parameter 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD) was listed in the previous permit as a report requirement with the stipulations that the permittee may be allowed to discontinue the sampling and monitoring requirement after the second year, if the results are below the specified value for this parameter. The permittee requested removal of this parameter in the renewal application. An evaluation of the DMRs revealed that non-detect was reported for this parameter. Therefore, the parameter 2,3,7,8-Tetrachlorodibenzo-p-dioxin (TCDD) will be removed from this permit.

Please be aware that the Department of Environmental Quality has completed the TMDLs for waterbodies located in the Ouachita River Basin. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDLs. The DEQ reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status or the work being done to establish future effluent limitations and additional permit conditions.

The **Monitoring Requirements, Sample Types, and Frequency of Sampling** will be as follow:

Effluent Characteristics	Monitoring Requirements	
	Measurement Frequency	Sample Type
Flow	1/month	Estimate
TOC	1/month	Grab
Oil & Grease	1/month	Grab
Ammonia (NH_3-N)	1/month	Grab
Total Phenols (4AAP)	1/month	Grab
Metals and Cyanide	1/month	Grab
Volatile Compounds	1/year	Grab
Acid Compounds	1/year	Grab
Base Neutral Compounds	1/year	Grab
Pesticides and PCB's	1/year	Grab
pH	1/day	Grab

Environmental Impact Questionnaire:

Applicant Comments/Responses (verbatim from applicant)

1. Have the potential and real adverse effects of the proposed facility been avoided to the maximum extent possible?

2. Does a cost benefit analysis of the environmental impact costs balanced against the social and economic benefits of the proposed facility demonstrate that the latter outweighs the former?

3. Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing nonenvironmental benefits?

4. Are there alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing nonenvironmental benefits?

5. Are there mitigating measures which would offer more protection to the environment than the facility as proposed without unduly curtailing nonenvironmental benefits?

This is an existing facility with no modifications to the site. The original IT questions were submitted with the initial permit; however, the permittee has updated their responses in the renewal application.

XIII. TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Fact Sheet.

XIV. REFERENCES:

Louisiana Water Quality Management Plan, Vol. 8, Appendix A "Areawide Effluent Limitations Policy", Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan, Vol. 5, Part B, "Water Quality Inventory", Louisiana Department of Environmental Quality, 2002 and 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards", Louisiana Department of Environmental Quality, 2006.

LA 2004 Integrated Report with FINAL EPA Additions, August 17, 2005.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 23 - "The LPDES Program", Louisiana Department of Environmental Quality, 2006.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, CECOS International, Inc., Calcasieu Facility, June 30, 2004.